

**MITT ROMNEY** 

GOVERNOR

KERRY HEALEY

LIEUTENANT GOVERNOR

#### THE COMMONWEALTH OF MASSACHUSETTS

## DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

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COMMISSIONER

January 9, 2006

Andrew J. Newman, Esq. Rubin and Rudman LLP 50 Rowes Wharf Boston, MA 02110-3319

Re: Blackstone Gas Company, D.T.E. 05-50

Dear Mr. Newman:

Enclosed please find the Department of Telecommunications and Energy's Second Set of Information Requests to Blackstone Gas Company issued in the above-captioned matter. Responses are due on or before January 19, 2006. Thank you for your attention in this matter.

Sincerely,

John J. Geary Hearing Officer

Enc.

cc: Mary L. Cottrell, Secretary

### COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

# SECOND SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO BLACKSTONE GAS COMPANY D.T.E. 05-50

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Blackstone Gas Company ("Blackstone" or "Company"), the following information requests:

### **INSTRUCTIONS**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

- 1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
- 2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
- 3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 4. The term "provide complete and detailed documentation" means:
  - Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn, and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
- 5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

D.T.E. 05-50

6. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

- 7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the response to: (1) John J. Geary, Hearing Officer; (2) Elizabeth Jackson, Natural Gas Division; (3) Cynthia Bradbury, Natural Gas Division; and (4) Andreas Thanos, Assistant Director Natural Gas Division.
- 8. Responses are due by 5 p.m., January 19, 2006.

### **INFORMATION REQUESTS**

- Please discuss any promotional activities or programs that the Company has undertaken in the past five years (i.e., 2001 through 2005) to increase growth on its system. Also discuss how successful these activities or programs have been. Further discuss any promotional activities or programs that Blackstone plans to undertake in the next five years (i.e., 2006 through 2010) to increase growth on its system.
- DTE 2-2 Please discuss any problems that Blackstone has had in serving its customers in the past five years (<u>i.e.</u>, 2001 through 2005) during peak and off-peak periods and how the Company resolved those problems.
- DTE 2-3 Please provide the dates during the past five years (<u>i.e.</u>, 2001 through 2005) when Blackstone interrupted gas service to any of its firm supply customers.